Read the Label: Avoid pesticide illness, injury or penalty

How often have you heard yourself or a co-worker say, "*If only I had taken the time to read the label, I would have applied the product safely and avoided an injury*?" Or, "*If I had spent five minutes reviewing the label, I could have avoided the penalty for failure to follow the label."*

Such lamenting probably has been heard or expressed more often than we care to remember.

Now, more than ever, it's important to *Read the Label* before using a pesticide in order to avoid injury and penalty. Pesticide labels are legal documents. If you rely only upon your memory when applying a pesticide (previously used), then you may later have to deal with the most common violation of pesticide law in Washington – use of a pesticide inconsistent with the label.

According to a 1999 EPA report, Consumer Labeling Initiative Phase II, consumers generally do not read environmental information, storage and disposal information on product labels for outdoor pesticides, household cleaners, and indoor insecticides. The stakeholders from this study felt that consumers need additional motivation to read and follow product labels.

In Washington, Bill Mason, Public Health Advisor with the State Department of Health reports

WASHINGTON STATE DEPT. OF HEALTH PESTICIDE COMPLAINTS

	TOTAL NO. OF	NO. OF EXPOSURE CASES		
	DEFINITE, PROBABLE	RELATED TO LABELING		
YEAR	AND POSSIBLE CASES	TOTAL	RESIDENTIAL	COMMERCIAL
2000	202	5	3	2
2001	121	6	4	2
2002	174	16	11	5
2003	184	19	15	4
Total:	681	46	33	13

* Did not read or follow the label (Source: Washington State Department of Health).

that between 2000 and 2003, 46 cases of pesticide exposure resulted in an injury or illness because of an individuals' failure to read the label or follow the directions.

Among the 46 cases, the problems leading to exposure included over application, failure to wear required PPE, off label use, inadequate ventilation, application during windy conditions, and use of faulty equipment. Relatively few cases investigated by DOH between 2000-2003 involved pesticide exposures to a commercial applicator compared to an increase in the number of reported residential cases.

Ron Angel, vice president of Washington Tree Service and member of the Interstate Professional Applicators Association notes, "We use many of the same chemicals year after year, but annually we review labels to see what has changed. Directions related to pesticide use can and do change often, affecting how, where and when we make applications."

PPE requirements also change, and sometimes become more restrictive. Restricted entry intervals (REI) and pre-harvest intervals (PHI) are often revised, too. Even when the product itself does not change, if it is being sold by a different manufacturer, the number assigned by EPA may change upon transfer.

Applicators must vigilantly read and follow the container labels, and also any supplemental labeling. 'Supplemental labeling' is a term used by EPA to describe uses, use directions, or other instructions that *diffe*r from those on a master product label. Requirements on supplemental labels may actually supersede directions on the container label unless the existing product label and/or state requirements are more restrictive.

Insert GRAPHIC - diazinon notice to retailers

Residential sales of diazinon ended December 2004

Under the Food Quality Protection Act of 1996, the EPA continues to carry out regulations that serve to reduce potential risk from pesticides to people and the environment. These regulation changes alter many labels for organophosphate pesticides, such as diazinon. As of December 31, 2004, residential use of diazinon for lawn and garden use (non-agricultural purposes) ended. While it's illegal for retailers to sell diazinon for residential use, consumers who purchased product prior to January 1, 2005, may use it as long as they follow directions and heed

precautions. For more information see EPA's diazinon webpage at www.epa.gov/oppsrrd1/op/diazinon.htm**.**

Revised WPS glove requirements

As of November 1, 2004, all agricultural workers (harvesters, cultivators, pesticide handlers) on farms and in forests, nurseries and greenhouses can wear glove liners (except lined or flocked gloves) beneath chemical-resistant gloves to apply pesticides.

The new requirements state that glove liners should:

- be no longer than the chemical-resistant glove
- not extend outside the glove
- be tossed after 10 hours of use, or upon contamination

In addition, agricultural pilots do not have to wear chemical-resistant gloves when entering or exiting aircraft.

The future holds global classification and labeling

For the past 12 year(s), EPA, the Department of Labor Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT), and other agencies in the United States have participated in discussions related to the proposed implementation of the new international system for pesticide labels called Globally Harmonized System of Classification and Labeling of Chemicals or GHS, for short.

The objectives of global classification and labeling are many and include:

- Developing compatible labeling and safety data sheets
- Promoting common, consistent criteria for classifying chemicals according to their health, physical and environmental hazards
- Enhancing protection of humans and the environment
- Promoting safer transport, handling and use of chemicals
- Improving communication on chemical safety for consumers, workers, emergency responders
- Reducing international trade barriers; promoting greater consistency in regulatory requirements

GHS is the United Nations' plan for the classification and labeling of hazardous chemicals, including pesticides. In order to apply this system in the United States, more than 22,000 pesticide labels must be revised. This multiple-stage process likely would span several years, if EPA were to amend applicable labeling rules and policies. Areas of standardization (harmonization) will be based on products' physical hazards and key health and environmental effects. Such a system also will introduce standardized labels, namely symbols (pictograms) for eight toxicity classifications, two signal words (*Danger* and *Warning*), hazard statements, product identifiers, and ingredient disclosures.

Some in the field have challenged the benefits of implementing GHS for pesticide labels since pesticide products are labeled only for use within a single country. According to Ray McAllister with CropLife America, the actual implementation of this global and highly complex, if not controversial, system is years away.

For more detailed information about GHS, visit
http://www.epa.gov/oppfead1/international/globalharmon.htm